

**STATUS:** Effective

**POLICY NUMBER:** Air-034-NPD

**SUBJECT:** Guidelines for Approval and Use of Representative Stack Test Data

**AUTHORIZED:** Thomas W. Easterly, Commissioner

**SUPERSEDES:** New

**ISSUING OFFICE(S):** Office of Air Quality, Compliance Branch

**ORIGINALLY EFFECTIVE:** February 3, 2010

**RENEWED/REVISED:**

**Disclaimer:** This Nonrule Policy Document (NPD) is being established by the Indiana Department of Environmental Management (IDEM) consistent with its authority under [IC 13-14-1-11.5](#). It is intended solely as guidance and shall be used in conjunction with applicable rules or laws. It does not replace applicable rules and laws, and, if it conflicts with these rules or laws, the rules or laws shall control. Under [IC 13-14-1-11.5](#), this policy will be available for public inspection for at least 45 days prior to presentation to the appropriate state environment board and may be put into effect by IDEM 30 days afterward. If the nonrule policy is presented to more than one board, it will be effective 30 days after presentation to the last. IDEM also will submit the policy to the Indiana Register for publication.

## 1.0 PURPOSE

This policy provides interested parties with the criteria for submittal and acceptance of representative stack test data that may be used in lieu of compliance testing, emission factor development, or billing purposes.

## 2.0 SCOPE

IDEM will begin using this revised NPD in reviewing requests to use representative stack test data submitted after the effective date of this nonrule policy until such time as the NPD is revised. This policy outlines the circumstances in which IDEM will consider the use of representative test data, the submittal requirements sources must meet when petitioning the IDEM for the use of representative test data, and outlines the procedure IDEM will use when determining whether the data is truly representative and can be approved. Validation of representative test data involves the source proving to the satisfaction of IDEM that processes in question are identical, or that their similarity is such that they may be considered identical. This may include a source documenting the physical makeup of the units, their mode of operation, and their method of controlling emissions, if applicable. This policy was written to provide consistency in addressing the issues that arise concerning when sources petition to use representative test data and what criteria must be met before IDEM will accept representative test data. Adherence to this policy will allow the agency to determine whether the test data can be validated as acceptable for use by the source.

## 3.0 SUMMARY

Air pollution sources are periodically required to quantify and test emissions released to the atmosphere. The quantification of emissions is usually required by a permit, a New Source Performance Standard (NSPS) or a National Emission Standard for Hazardous Air Pollutants (NESHAP). In certain cases, it is appropriate to use representative test data to estimate or quantify air emissions. For the purposes of this document, representative test data is considered data generated through acceptable U.S. Environmental Protection Agency (U.S. EPA), or equivalent test methods; mass balance studies, industry specific or manufacturer's trade group testing that has been deemed to be acceptable by IDEM. Representative test data is data that has been collected on another unit or process that is identical to or at least very similar to the proposed piece of equipment the data will be applied to. The similarity between the processes should be such that it may be reasonably expected the air emissions from each process are nearly identical to each other. Representative test data may be used by sources during a permit application in order to estimate emissions for permit level determinations, for use as an emission factor, air emission estimation or billing purposes, and may also be used in lieu of compliance testing as appropriate. In some cases sources may wish to use representative test data in lieu of AP-42, or in situations where emission data does not exist. Sources wishing to develop unit specific emission factors for subsequent consideration as representative test data should consult with IDEM's Nonrule Policy Document Air-014 "Approval and Validation of Alternate Emission Factors".

## 4.0 DEFINITIONS

4.1. "Compliance Data Section (CDS)" - The section within IDEM's Office of Compliance and Enforcement that is assigned the oversight and quality assurance of compliance tests and continuous emissions monitoring systems.

4.2. "Indiana Department of Environmental Management (IDEM)" - An agency of Indiana state government whose mission is to implement federal and state regulations to protect human health and the environment while allowing the environmentally sound operations of industrial, agricultural, commercial, and government activities vital to a prosperous economy.

4.3. "National Emissions Standards for Hazardous Pollutants (NESHAP)" - Emissions standards set by the U.S. EPA for a hazardous air pollutant (HAP) not covered by a NAAQS. The standards for a particular source category require the maximum degree of emission reduction that the U.S. EPA determines to be achievable, which is known as the Maximum Achievable Control Technology (MACT). These standards are authorized by Section 112 of the Clean Air Act (CAA) and the regulations are published in 40 CFR Parts 61 and 63.

4.4. "New Source Performance Standard (NSPS)" - Pollution control standards issued by the U.S. EPA as authorized by Section 111 of the CAA. These regulations are published in 40 CFR Part 60.

4.5. "Permit" - An approval or denial issued, renewed, amended, revised, or modified under Indiana Administrative Code 326.

4.6. "Protection of the Environment (40 CFR)" - "Title 40 of the United States Code of Federal Regulations containing U.S. EPA regulations."

4.7. "Representative Test Data" - Test data submitted in lieu of testing on a particular process that was obtained through testing or other approved means on a similar or identical process.

4.8. "Source" - An aggregation of one or more stationary emissions units that are located on one piece of property or on contiguous or adjacent properties, are owned or operated by the same person (or by person under common control), and belong to a single major industrial grouping. For purposes of defining a source, two or more contiguous or adjacent properties shall be considered part of a single major industrial grouping if all of the pollutant emitting activities at such continuous or adjacent properties belong to the same major group that all have the same two digit Standard Industrial Classification (SIC) code as described in the Standard Industrial Classification Manual, 1987. Any stationary source (or group of stationary sources) that supports another source where both are under common control of the same person (or persons under common control) and are located on contiguous or adjacent properties, shall be considered a support facility and part of the same source regardless of the two digit SIC code for that support facility. A stationary source (or group of stationary sources) is considered a support facility to a source if at least 50% of the output of the support facility is dedicated to the source. A source does not include mobile source, nonroad engines, or nonroad vehicles.

4.9 "United States Environmental Protection Agency (U.S. EPA)" - The United States Environmental Protection Agency, a division of the federal government that writes and implements regulations and sets the national standards in regards to protecting the environment.

## **5.0 ROLES**

### **5.1. Non-IDEM parties' responsibilities:**

#### **A. Source designated representative:**

1. Responsible for compiling all necessary information and submitting request in accordance with this policy as applicable.

### **5.2. IDEM parties:**

#### **A. CDS section chief:**

1. Receives requests, assigns appropriate reviewer as applicable, and reviews recommendations regarding acceptance or rejection of the request to use representative stack test data.

#### **B. CDS Reviewer:**

1. Receives assignment to review request from CDS section chief, reviews request and supporting information, and makes recommendation to CDS section chief.

## **6.0 POLICY**

6.1. Sources with facilities or units having potential emissions less than 250 tons per year (TPY) of any regulated

air pollutant and whose actual emissions are less than 50% of an applicable limit may petition to use representative test data obtained through testing of identical or very similar processes within their company's hierarchy, or through manufacturer or trade group association studies. This data may be used to provide emission factors for permitting decisions, emission estimation or billing purposes or to demonstrate compliance in lieu of a stack test. Limiting the applicability to units demonstrating actual emissions are less than 50% of a compliance limit or permitting threshold gives an appropriate level of assurance a unit is within acceptable margins of statistical variation. The use of representative test data may be particularly well suited to instances where sources wish to use data from an identical unit the source or company operates at another site or where a source has multiple identical or very similar processes through which testing on one unit may be considered as representative of the whole. Sources whose submittals are determined to be representative and whose actual emissions are less than 50% of an applicable limit may use representative data as approved by IDEM. IDEM will review all submittals for completeness and acceptability. If additional information is needed, IDEM will make a request to the source to obtain the necessary information. After a decision has been reached, IDEM will inform the source regarding acceptance or rejection of the data. This policy does not apply to NSPS or NESHAPs emission standards or testing requirements if testing is specifically required by an NSPS or NESHAP. Additionally this policy does not supersede the use of existing emission factors developed and approved for use by the U.S. EPA or IDEM.

6.2. Sources wishing to use representative test data shall adhere to the following guidelines for submittal and review of information. Information submitted as part of a request or permit application should contain the following information:

- A. A description of the process and any associated air pollution control equipment.
- B. A description of how the process for which the request is being made is identical (or at least very similar in design, operation, and control) to the process previously tested. The description should include identification of the process or equipment manufacturer, model number or other manufacturer's designation, rated capacity, operating specifications, and control device specifications.
- C. Complete test results and a description of the sampling methodology used while performing the test, including sample calculations and all required quality assurance requirements.
- D. Process data to document how the unit was run during the test, including process operating speed, raw materials used, or type of fuel combusted.
- E. Air pollution control monitoring data to document how the air pollution control unit was operating during the test, including flow rates, pressure drops, temperatures and other monitoring associated with the control device as applicable.

6.3. Test data should be obtained using approved U.S. EPA reference methods (or equivalent) found in the appendices to 40 CFR Part 51 and 40 CFR Part 60. Other sampling methods such as U.S. EPA Conditional Test Methods (CTMs), American Society for Testing and Measurements (ASTM), California Air Resources Board (CARB), National Council for Air and Stream Improvement (NCASI) may be used. Equivalent test methods may also be used, when appropriate, but should contain sufficient documentation about the test method to assure accuracy and reliability.

6.4. Sources wishing to petition for the use of representative emissions data during the permitting process should submit their request to the individual currently working on their permit application. For sources wishing to use representative emissions data in lieu of stack testing, or for billing purposes, the request should be made to:

- A. Compliance Data Section  
Compliance and Enforcement Branch  
Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

## 7.0 REFERENCES

7.1. Indiana Administrative Codes:

- A. [326 IAC 2-2](#), Prevention of Significant Deterioration (PSD) Requirements
- B. [326 IAC 2-7](#), Part 70 Permit Program
- C. [326 IAC 2-8](#), Federally Enforceable State Operating Permit Program
- D. [326 IAC 3-6](#), Source Sampling Procedures

7.2. U.S. EPA 40 CFR Protection of the Environment

## 8.0 SIGNATURES



Thomas W. Easterly, Commissioner  
Indiana Department of Environmental Management

6/8/09

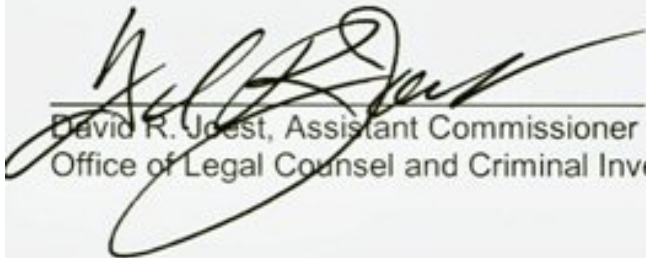
Date



Daniel Murray, Assistant Commissioner  
Office of Air Quality

5/21/09

Date



David R. Joest, Assistant Commissioner  
Office of Legal Counsel and Criminal Investigations

06/05/09

Date

This policy is consistent with Agency requirements.



Quality Assurance Program, Planning and Assessment  
Indiana Department of Environmental Management

6/2/09

Date

Posted: 05/25/2011 by Legislative Services Agency  
An [html](#) version of this document.